



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

MAY 28 2014

Spanky LLC
Attn: David Loftus
800 N. Whittier Dr.
Beverly Hills, CA 90210

Re: RR 14L-02

Dear Mr. Loftus:

The Federal Election Commission ("Commission"), the regulatory agency that administers and enforces the Federal Election Campaign Act of 1971, as amended (the "Act"), has ascertained information in the normal course of carrying out its supervisory responsibilities indicating that Spanky LLC may have information concerning a potential violation of the Act. The matter has been referred by the Reports Analysis Division to the Commission's Office of General Counsel for possible enforcement action under 2 U.S.C. § 437g. Based on the information provided by the Reports Analysis Division, it appears that Spanky LLC made excessive contributions in the form of loans to Flemming for Congress for the 2012 Primary Election totaling \$146,400. For further information, a copy of the referral document is enclosed. Notification of this referral is being provided to you pursuant to the Commission's Agency Procedure for Notice to Respondents in Non-Complaint Generated Matters, as published in the Federal Register on August, 4, 2009 (74 Fed. Reg. 38,617).

The Commission's Office of the General Counsel is reviewing this information in connection with making a recommendation to the Commission as to whether there is reason to believe that Spanky LLC violated the Act, an initial determination necessary to initiate an investigation into whether a violation has, in fact, occurred. See 2 U.S.C. § 437g(a)(2). Before the General Counsel makes such a recommendation, you may provide in writing any factual or legal materials that you believe are relevant to this matter, including any related documents. Your submission, if you choose to make one, must be submitted within 15 days of receipt of this letter and addressed to the General Counsel's Office. Subsequently, the General Counsel's Office will present its recommendations to the Commission. Any response submitted by you will be taken into account in these recommendations. The Commission will then consider the recommendations and, if the Commission finds that there is reason to believe Spanky LLC violated the Act, initiate an enforcement matter.

This matter will remain confidential in accordance with 2 U.S.C. §§ 437g(a)(4)(B) and 437g(a)(12)(A) unless you notify the Commission in writing that you wish the matter to be made public. If you intend to be represented by legal counsel in this matter, please advise the Commission by completing the enclosed form stating the name, address, and telephone number of such counsel, and authorizing such counsel to receive any notifications and other communications from the Commission.

Any correspondence sent to the Commission must be addressed as follows:

Mail

Federal Election Commission
Office of Complaints Examination & Legal Administration
Attn: Donna Rawls
999 E Street, NW
Washington, DC 20436

Email

drawls@fec.gov

If you have any questions, please contact Donna Rawls at (202) 694-1650 or toll free at (800) 424-9530.

Sincerely,



Jeff S. Jordan
Assistant General Counsel
Complaints Examination
& Legal Administration

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